

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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| <b>CATHOLIC LEGAL IMMIGRATION<br/>NETWORK, INC., et al.,</b>           | )                                    |
|  | )                                    |
|  | )                                    |
| Plaintiffs,  | )                                    |
|  | )                                    |
|  | )                                    |
| v.   | ) Civil Action No. 8:20-cv-02042-TDC |
|  | )                                    |
| <b>UNITED STATES CITIZENSHIP AND<br/>IMMIGRATION SERVICES, et al.,</b> | )                                    |
|  | )                                    |
|  | )                                    |
| Defendants.  | )                                    |
|  | )                                    |

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**JOINT STATUS REPORT**

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS ("Request 1"), State ("Request 2"), and DHS ("Request 3") respectively. (Compl. ¶¶ 27-40.)

2. On November 6, 2020, USCIS produced 14 spreadsheets and 223 pages to Plaintiffs in response to Request 1. USCIS is presently processing the second production of USCIS pages. Subject to FOIA exemptions, the second production of USCIS pages is expected to be produced on or about December 7, 2020. Per the request of Plaintiffs, the second

production will consist of responsive, non-FOIA exempt documents from the Service Center Operations component (SCOPS). Once all SCOPS responsive, non-FOIA exempt documents have been produced, USCIS will then produce responsive, non-FOIA exempt documents from the Office of Policy and Strategy component (OP&S).

3. State has, thus far, identified approximately 8,500 unclassified documents potentially responsive to Request 2. State is continuing to collect unclassified potentially responsive documents. State now plans to move forward with its de-duplication of the collected documents and begin making productions on a rolling basis. Any unclassified potentially responsive documents that are collected hereafter will be processed after the previously collected unclassified potentially responsive documents have been processed. The first production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before December 17, 2020. While searches for records on classified systems continue to be inhibited by the ongoing impact of COVID-19 mitigation measures on staffing, State will initiate searches of classified systems promptly upon the relevant employees re-obtaining access to those systems.

4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: November 13, 2020

Respectfully submitted,

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